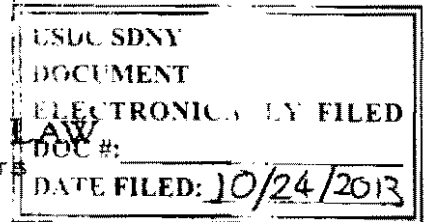


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October 21, 2013

By Fax Only

Hon. Alvin K. Hellerstein
 (212) 805-7942 (fax)

*Christopher's motion for Reconsideration
 being late, denied his Answer's due,
 along with those of the other def's,
 on Oct. 31, 2013. A.K. Hellerstein
 10/24/13*

Re: Oxford Health Ins. v. David Hamner, 13-CIV-375 (AKH)

Dear Judge Hellerstein:

I represent Defendant Allan Christopher ("AC") in this RICO action alleging insurance fraud. I seek an extension of AC's time to answer until ten days after a decision on AC's motion for reconsideration. I'm concerned that answering may waive the objection to lack of personal jurisdiction.

Briefly, 1) on 10/9/13, the Court denied AC's motion to dismiss, 2) on 10/11/13 AC moved for reconsideration on just the question of whether he had been effectively served.

Thus: i) AC's answer is due 10/23/13; ii) no previous requests for adjournment have been made; iv) all parties have consented; v) I assume you will decide AC's motion for reconsideration within one month, and therefore propose a one-month adjournment of the dates in a proposed Case Management Plan to be submitted to you on 11/1:

Subject	Current Deadline	New Deadline
Non-expert discovery	4/15/14	5/15/14
Joinder	12/16/13	1/16/14
Dispositive motions	5/15/14	6/15/14
Settlement conference	6/20/14	7/20/14
Initial disclosures	11/8/13	12/8/13
Initial discovery demands	11/22/13	12/22/13

Depositions	no date given	no change
Responses to discovery demands	12/23/13	1/23/14
Supplemental discovery demands	3/14/14	4/14/14

Thank you for considering this request.

Sincerely



Richard Pu

cc by fax: Bruno, Seybert